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17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 RICHARD GIBSON, and HERIBERTO
20 VALIENTE,

21 Plaintiffs,

22 v.

23 MGM RESORTS INTERNATIONAL,
24 CENDYN GROUP, LLC, THE RAINMAKER
25 GROUP UNLIMITED, INC., CAESARS
26 ENTERTAINMENT INC., TREASURE
ISLAND, LLC, WYNN RESORTS HOLDINGS,
LLC,

27 Defendants.

Case No. 2:23-cv-00140-MMD-DJA

28 **STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE TO
FILE REPLIES IN SUPPORT OF
DEFENDANTS' MOTIONS TO STAY
DISCOVERY**

(FIRST REQUEST)

STIPULATION

Plaintiffs Richard Gibson and Heriberto Valiente (together, “Plaintiffs”) and Defendants Cendyn Group, LLC, the Rainmaker Group Unlimited, Inc., Caesars Entertainment, Inc., Treasure Island, LLC, and Wynn Resorts Holdings, LLC, and MGM Resorts International (“MGM”) (together, “Defendants”) (Plaintiffs and Defendants collectively, the “Parties”), by and through their counsel, hereby stipulate and agree to extend Local Rule 7-2(b)’s deadline for Defendants to file replies in support of Certain Defendants’ Motion to Partially Stay Discovery, ECF No. 114, and MGM’s Joinder to Certain Defendants’ Joint Motion to Stay Discovery and Motion to Stay Discovery, ECF No. 116 (together, “Motions to Stay”) for the following reasons.

1. Defendants filed their Motions to Stay on May 22, 2023.
2. Plaintiffs' Oppositions to Defendants' Motions to Stay, ECF Nos. 119 & 120, were filed on June 5, 2023.
3. Pursuant to Local Rule 7-2(b), Defendants' replies in support of their Motions to Stay are due on Monday, June 12, 2023.
4. The Parties' [Proposed] Discovery Plan and Scheduling Order, ECF No. 111, was filed on May 15, 2023 and is pending before this Court. The Parties agreed to extend the briefing schedule for replies in support of Defendants' Motions to Stay for a period of one week, to June 19, 2023, as stated on page 10 of the Parties' [Proposed] Discovery Plan and Scheduling Order, ECF No. 111.

Accordingly, the Parties hereby stipulate and agree, and respectfully request that the Court order, as follows:

1. The deadline for Defendants' replies in support of their Motions to Stay is extended to and including, Monday, June 19, 2023.
2. This stipulation is filed in good faith and not intended to cause delay, but rather to provide Defendants sufficient time to prepare and file their replies in support of their Motions to Stay in this multi-party putative class action.

1 3. Nothing in this stipulation is intended in any way to waive or affect the rights, claims,
2 defenses, objections, or arguments that any party may have with respect to any matter,
3 other than those expressly addressed and agreed herein.

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1 Dated: June 8, 2023

2 /s/ Steve W. Berman

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26 *Attorneys for Defendant MGM Resorts
27 International*

28 **ORDER**

16 IT IS SO ORDERED.

17 UNITED STATES MAGISTRATE JUDGE

18
19 DATED: June ___, 2023

CERTIFICATE OF SERVICE

The undersigned hereby certifies that service of the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO FILE REPLIES IN SUPPORT OF DEFENDANTS' MOTIONS TO STAY DISCOVERY** was served on the 8th day of June, 2023 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ J. Colby Williams

An employee of Campbell & Williams